

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CAROLINE CLARK,)	
Plaintiff)	
)	
vs.)	CIVIL ACTION NO.
)	A-12-CA-007-SS
AUSTIN MONTESSORI SCHOOL,)	
INC.,)	
Defendant)	

ORAL DEPOSITION

CALVIN CARTER

FEBRUARY 28, 2012

ORAL DEPOSITION OF CALVIN CARTER, produced as a witness at the instance of the Plaintiff and duly sworn, was taken in the above-styled and numbered cause on the 28th day of February, 2012, from 9:00 a.m. to 9:50 a.m., before Kim Furr, RPR, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of The Cook Law Firm, 919 Congress Avenue, Suite 1145, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

1 something that you kept at the school?

2 A. I kept it at the school.

3 Q. Where at the school did you keep it?

4 A. In the storage unit.

5 Q. Was that list still there when you left the
6 school?

7 A. I don't remember seeing it.

8 Q. And can you remember what that list contained?

9 A. Well, just things that I do every night. I
10 guess they gave it to me so that -- until you got used
11 to -- well, at least I figured that once you got used to
12 it, you didn't need to look at it anymore. So that's
13 what it was.

14 Q. Did they ask you to follow any particular
15 address code or wear a uniform?

16 A. No.

17 Q. And no one from Austin Montessori School gave
18 you any training in how to do the cleaning tasks?

19 A. No.

20 Q. Other than the friend that you mentioned that
21 you sometimes had brought with you, did anyone else ever
22 assist you in your cleaning tasks?

23 A. A couple of times, yeah.

24 Q. And who would assist you?

25 A. A couple of friends, every now and then. If I

1 Q. And what did you do there?

2 A. I started out as a mail clerk and ended up as
3 a supervisor of mail services.

4 Q. And when -- are you still working there?

5 A. No, I'm not.

6 Q. When did you stop working there?

7 A. Five years ago. I worked there 27 years,
8 28 years.

9 Q. Was is that 2006 or 2007?

10 A. Uh-huh.

11 Q. Which year?

12 A. I'm really -- all I know is, I worked there
13 27, 28 years. It was five years ago. I'll tell you I
14 retired five years ago from there.

15 Q. And for that last year that you were working
16 there, what were your hours?

17 A. It was, like, 7:30 to 4:00.

18 Q. And then while you were working at Austin
19 Montessori School, what were your hours?

20 MR. GONZALES: Objection; form.

21 Objection; assumes facts not established.

22 THE WITNESS: Am I supposed to answer
23 that?

24 MR. GONZALES: You can.

25 A. I didn't have any set hours. As long as the

1 Q. Can you remember approximately when, in 2010,
2 you stopped work there?

3 A. It was at the end of the spring term.
4 Actually, I -- at the end of the school in -- during the
5 summer, that's when the kids were out, and normally I
6 would just come back out there and start the next year
7 in August or September, depending. And I just decided
8 that I had had enough.

9 Q. When you said you decided you had had enough,
10 what did you mean?

11 A. Well, my knees were really hurting me bad, and
12 the prior -- in that same year, I had missed several
13 days because my knees were hurting so bad, I just
14 couldn't do it. And then was -- and I felt bad having
15 to call in and say, you know, "I can't work today. My
16 legs are hurting."

17 So I decided to give it up.

18 Q. For that time from 1989 until 2010, did you
19 ever work in any other position at Austin Montessori
20 school?

21 A. No, I didn't.

22 Q. Did you have any other jobs during that time?

23 A. I had my regular full-time job.

24 Q. What was your regular full-time job?

25 A. It was at the University of Texas.

1 A. Right.

2 Q. In other words, it was a calendar that was
3 given to you so that you would see the school's
4 calendar. Correct?

5 A. Correct.

6 Q. And you testified that that was a calendar of
7 plays and parent-teacher meetings and that sort of
8 thing?

9 A. Correct.

10 Q. Mr. Carter, you testified earlier that while
11 you were working at Austin Montessori School, you had a
12 couple of other different jobs. Correct?

13 A. Correct.

14 Q. And in fact, if you had wanted to clean other
15 schools during the same time period, you had that
16 option. Correct?

17 A. Yes.

18 Q. You wouldn't have to seek the approval of
19 Austin Montessori School. Correct?

20 A. That's correct.

21 MR. GONZALES: I'll pass the witness.

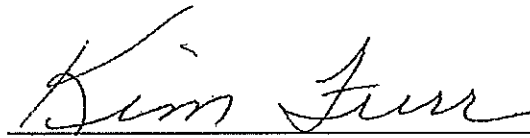
22 EXAMINATION

23 QUESTIONS BY MS. JACOBS:

24 Q. Did you ever do any other cleaning work during
25 the time that you were working full time for UT and also

1 I further certify that I am neither attorney or
2 counsel for, related to, nor employed by any parties
3 to the action in which this testimony was taken and,
4 further, I am not a relative or employee of any
5 counsel employed by the parties hereto or
6 financially interested in the action.

7
8 SUBSCRIBED AND SWORN TO under my hand and seal
9 of office on this the 9th day of March, 2012.

10
11 
12

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